## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

| NEW YORK LIFE INSURANCE AND        | § |                                |
|------------------------------------|---|--------------------------------|
| ANNUITY CORPORATION,               | § |                                |
|                                    | § |                                |
| Plaintiff,                         | § |                                |
|                                    | § |                                |
| VS.                                | § |                                |
|                                    | § |                                |
| BARBARA BROWN FAMILY TRUST         | § |                                |
| <b>DTD 3/12/2010; BARBARA JEAN</b> | § |                                |
| BROWN LIVING TRUST DTD             | § | CIVIL ACTION NO. 4:21-CV-490-O |
| 3/12/2010; SHARON KAY BRITTON      | § |                                |
| AND KEN BRITTON, AS CO-            | § |                                |
| TRUSTEES OF THE BARBARA JEAN       | § |                                |
| <b>BROWN FAMILY TRUST DTD</b>      | § |                                |
| 3/12/2010; BARBARA JEAN BROWN      | § |                                |
| LIVING TRUST DTD 5/29/2018; BOB    | § |                                |
| SHELTON, AS TRUSTEE OF             | § |                                |
| BARBARA JEAN BROWN LIVING          | § |                                |
| TRUST DTD 5/29/2018,               | § |                                |
|                                    | § |                                |
| Defendants.                        | § |                                |

## MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL FOR PLAINTIFF NEW YORK LIFE INSURANCE AND ANNUITY CORPORATION

Plaintiff New York Life Insurance and Annuity Corporation ("Plaintiff") moves this Court for an order withdrawing Sinéad O'Carroll and Reeves & Brightwell LLP ("Reeves & Brightwell") and substituting Linda G. Moore and Estes Thorne & Carr PLLC ("ETC") as counsel of record for Plaintiff in this case.

Plaintiff has recently retained Linda G. Moore and the law firm of ETC to represent its interests in this lawsuit because they reside in and maintain their principal office in this District.

Plaintiff requests that the Court enter an Order allowing for the withdrawal of Ms. O'Carroll and Reeves & Brightwell and the substitution of Ms. Moore and ETC as counsel of record for Plaintiff in this case.

If this Motion is granted by the Court, counsel of record for Plaintiff on whom all notices, papers, and pleadings in this action may be served, will be:

Linda G. Moore Estes Thorne & Carr, PLLC 3811 Turtle Creek Blvd., Suite 2000 Dallas, Texas 75219 Imoore@estesthornecarr.com

This case was filed on April 1, 2021, and this substitution of counsel will not delay the prosecution of this case in that Plaintiff is in the process of having the summons issued for service on the defendants.

## Respectfully submitted,

By: /s/ Sinead O'Carroll
Sinéad O'Carroll
Texas State Bar No. 24013253
Reeves & Brightwell LLP
3711 S. Mopac Expy., Bldg. 1, Ste. 500
Austin, Texas 78746
(512) 334-4500
(512) 334-4492 Facsimile
socarroll@reevesbrightwell.com

Counsel for Plaintiff New York Life Insurance and Annuity Corporation